



EPA Region 9 Fact Sheet on Environmental Indicators (EIs) and Cleanup Goals for RCRA Corrective Action

In 1998, the Environmental Protection Agency (EPA) issued two cleanup goals to ensure that people and groundwater resources were safe from environmental releases. These two cleanup goals, called Environmental Indicators (EIs), state that by 2005, 95% of high priority sites will have current human exposures under control, and 70% of high priority sites will have the migration of contaminated groundwater under control.

In Region 9, there are 163 facilities on the RCRA Cleanup Baseline, including yours, which are subject to meeting these goals. Because it is important to ensure the safety of people and groundwater resources, there may be added attention on your site by the state, EPA and the public to track the progress toward meeting these cleanup goals.

Questions & Answers

Why were RCRA Corrective Action EIs created?

The RCRA Corrective Action program wanted a way to measure whether sites have taken significant steps towards cleaning up environmental releases, by ensuring that people and groundwater resources were safe. In addition, the program wanted a way to easily communicate the goals of the program and our progress towards meeting these goals.

At the same time, Congress had passed the Government Performance and Results Act (GPRA), which requires all federal agencies to report program results. Therefore, the RCRA Corrective Action program selected the two environmental indicators as the GPRA cleanup goals for RCRA corrective action.

We feel these goals are an effective means to measure the environmental success of the corrective action program without regard to procedural steps.

Why is my site on the RCRA Cleanup Baseline?

The RCRA Corrective Action program ranked sites low, medium, or high priority, based on a site's environmental releases and potential for impacting people and the environment. If your site ranked

high before 1997, it was automatically included on the baseline. The states and EPA also added some sites to the RCRA Cleanup Baseline, which posed a potentially significant environmental risk or were of particular concern to communities, despite being ranked medium or low.

What are the two Environmental Indicators (EIs) for corrective action?

The two Environmental Indicators are:

Current Human Exposures Under Control, and

Migration of Contaminated Groundwater Under Control

The Human Exposures EI evaluates whether the contaminants present at the site pose unacceptable health risks to humans. All potential pathways are considered (i.e., indoor and ambient air, soil, groundwater, and surface water).

The Contaminated Groundwater EI evaluates whether the movement of contaminated groundwater is contained and under control. It also assesses the impacts of contaminated groundwater discharging into surface water bodies.

Both of these EIs only take into consideration current

site conditions. They also consider conditions across the entire site, not on a unit-by-unit basis.

How are sites evaluated to see if they meet the EIs?

In February 1999, two forms were developed by the states and EPA regions to document EI determinations at all sites on the baseline. In Region 9, state and EPA staff complete these forms jointly, and determine whether a site has satisfied EIs. The three possible determinations are:

YES, conditions are “Under Control”

NO, conditions are NOT “Under Control”

IN, Insufficient information is available to determine if conditions are “Under Control”

Facilities or their consultants may assist regulators in the evaluation by providing information on current environmental conditions. The EI Evaluation forms and general EI information are available on the internet at <http://www.epa.gov/osw/cleanup.htm>.

How can I meet these EIs?

To satisfy EIs, sites should address environmental releases to safeguard the health of people and groundwater resources. For instance, human exposures can be considered “under control” if adequately protective controls are in place to prevent unacceptable exposures (i.e., cut exposure pathways between humans and contamination).

Rather than prescribe a specific process to achieve these cleanup goals, EPA would like facilities to achieve EIs by whatever means you and the regulators believe is most effective and expedient. There are several ways to meet these goals from implementing appropriate stabilization measures to final remedy. It may be beneficial to develop a dialogue with the state or federal project manager to determine what is needed to meet EIs at your site.

Meeting EIs is not equivalent to achieving a final remedy. EIs are different from final remedies, because they take into account only current conditions.

Can my site be removed from the list once it achieves both EIs?

No, your site stays on the list. We will assess whether the RCRA Cleanup Goals have been met for

all sites on the RCRA Cleanup Baseline. Unlike the Superfund National Priorities List (NPL), the RCRA Cleanup Baseline will remain the same through 2005. This will enable EPA to evaluate how effectively sites have protected people and groundwater resources from environmental releases, and to easily document the progress that is made.

How will EIs affect my site?

Meeting RCRA cleanup goals for corrective action is EPA’s #1 priority for the RCRA program, and we recognize that they are ambitious. Because these goals are important measures of the success of the corrective action program, there will be added attention on your site to achieve these EIs from the state, EPA, and Congress. Furthermore, EPA Region 9 intends to issue an annual progress report and launch a website to better inform the public about site cleanup progress in their community.

What are some of the benefits for meeting EIs?

The increased attention for sites on the baseline presents an excellent opportunity for companies to demonstrate to the public and regulators a commitment to taking significant steps in the cleanup process by meeting EIs.

Are EI determinations a point-in-time determination, or do they have to be maintained to ensure they remain true through time?

Yes, they are made at a point in time, and yes, we will review EI determinations periodically to ensure that they continue to accurately reflect site conditions through time.

Who do I contact to find out about my EI determinations?

For specific information about EI determinations at your site, please contact the state or federal project manager you normally work with.

You can also get general information about EIs on the internet at <http://www.epa.gov/osw/cleanup.htm>.